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District of Nevada

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7 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

18       Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests  
19 that the Court extend the time for Defendant to respond to Plaintiff's Complaint, currently due on  
20 April 6, 2020, by 21 days, through and including April 27, 2020.

21 This is Defendant's first request for an extension of time. Good cause exists for this extension  
22 because counsel wishes to consult with her client to explore whether settlement may be possible in this  
23 case.

24       Defendant's counsel will endeavor to complete this task as soon as possible. This request is  
25 made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for  
26 any inconvenience.

1                   On March 30, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no  
2 opposition to this motion.

3                   It is therefore respectfully requested that Defendant be granted an extension of time to respond  
4 to Plaintiff's Complaint, through and including April 27, 2020.

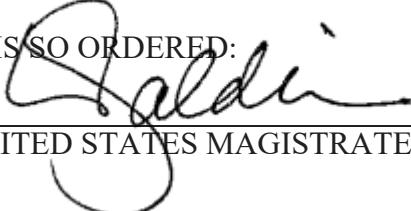
5  
6                   Dated: March 30, 2020

Respectfully submitted,

7                   NICHOLAS A. TRUTANICH  
8                   United States Attorney

9                   */s/ Allison J. Cheung*  
10                   ALLISON J. CHEUNG  
11                   Special Assistant United States Attorney

12                   IT IS SO ORDERED:

13                     
14                   \_\_\_\_\_  
15                   UNITED STATES MAGISTRATE JUDGE

16                   DATED: March 31, 2020.

## **CERTIFICATE OF SERVICE**

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT (FIRST REQUEST)** on the date, and via the method of service, identified below:

## CM/ECF:

Jared Walker  
jared@jwalker.law  
Attorney for Plaintiff

Hal Taylor  
haltaylorlawyer@gbis.com  
Attorney for Plaintiff

Dated: March 30, 2020

/s/ Allison J. Cheung  
ALLISON J. CHEUNG  
Special Assistant United States Attorney